

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**TAMMY ALVARADO; CLARA  
REDMOND; TAMMY HAGA; AMY  
RUMINSKI; and PAMELA JOHNSON  
Plaintiff,**

**V.**

**CLARK, LOVE & HUTSON, G.P.;  
MURPHY LAW FIRM, G.P.; CLAYTON  
A. CLARK; CLAYTON A. CLARK,  
ESQ., PC; SCOTT A. LOVE; SCOTT A.  
LOVE, PC; SHELLEY HUTSON;  
HUTSON LAW FIRM, P.C.; JAMES  
LEE, JR.; JAMES LEE LAW FIRM,  
PC; and ERIN MURPHY,**

**S**

**CIVIL ACTION NO. 4:19-cv--02148**

**DEFENDANTS' WITNESS LIST**

**EXHIBIT 2 TO DEFENDANTS' PRE-TRIAL ORDER**

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**TAMMY ALVARADO; CLARA  
REDMOND; TAMMY HAGA; AMY  
RUMINSKI; and PAMELA JOHNSON  
Plaintiff,**



**CIVIL ACTION NO. 4:19-cv--02148**

**v.**

**CLARK, LOVE & HUTSON, G.P.;  
MURPHY LAW FIRM, G.P.; CLAYTON  
A. CLARK; CLAYTON A. CLARK,  
ESQ., PC; SCOTT A. LOVE; SCOTT A.  
LOVE, PC; SHELLEY HUTSON;  
HUTSON LAW FIRM, P.C.; JAMES  
LEE, JR.; JAMES LEE LAW FIRM,  
PC; and ERIN MURPHY,**

## DEFENDANTS' WITNESS LIST

Defendants file this Joint Witness List identifying those witnesses that it will and may call in the event of a trial in this case:

- 1-5. Tammy Alvarado  
Clara Redmond  
Tammy Haga  
Amy Ruminski  
Pamela Johnson  
c/o James M. Beggs  
Beggs Landers Law Firm, PLLC  
140 East Irving Boulevard  
Irving, Texas 75060  
jim@beggslaw.com  
Telephone: 972-253-8000

Ms. Alvarado, Ms. Redmond, Ms. Haga, Ms. Ruminski, and Ms. Johson are plaintiffs and have information concerning their underlying MESH claims and conditions; their representation by defendants; their voluntary settlements of their underlying MESH claims, and related disclosures made by defendants; their claims in this case; their alleged damages in this case; and the circumstances by which they hired their lawyers in this case.

- 6-8. Clayton A. Clark  
Shelley Hutson  
Michael Moreland  
Custodian of Records for Clark Love & Huston, GP  
c/o Dale Jefferson  
Martin, Disiere, Jefferson & Wisdom, LLP  
808 Travis Street, Suite 200  
Houston, Texas 77002-5704  
jefferson@mdjwlaw.com  
Telephone: 713-632-1700  
Mr. Clark and Ms. Hutson are defendants and Mr. Moreland is an employee of one of the corporate defendants. They have knowledge concerning the underlying MESH litigation; plaintiffs' underlying MESH claims and conditions, including statutes of limitations issues; their representation of plaintiffs; plaintiffs' voluntary settlements of their underlying MESH claims; disclosures made concerning, and special master and court recommendations and approvals of, the underlying settlements; and their defenses in this case. Mr. Clark and Ms. Hutson have also been designated as experts.
9. Scott A. Love  
c/o Billy Shepherd  
770 South Post Oak Lane, Suite 420  
Houston, Texas 77056  
bshepherd@spcounsel.com  
Telephone No. (713) 955-4440; Facsimile No. +1 (713) 766-6542  
Mr. Love is a defendant and has knowledge concerning the underlying MESH litigation; plaintiffs' underlying MESH claims and conditions, including statutes of limitations issues; their representation of plaintiffs; plaintiffs' voluntary settlements of their underlying MESH claims; disclosures made concerning, and special master and court recommendations and approvals of, the underlying settlements; and their defenses in this case. Mr. Love has also been designated as an expert.
- 10-11. James Lee  
Erin Murphy  
Custodian of Records for  
c/o Don Jackson  
Ware Jackson  
2929 Allen Parkway, 39<sup>th</sup> Floor  
Houston, Texas 77019  
donjackson@warejackson.com  
Telephone: 713-659-6400  
Mr. Lee and Ms. Murphy are defendants and, in addition to having knowledge of their defenses in this case and would knowledge of subjects similar to those of which Mr. Clark, Mr. Love, and Ms. Hutson have knowledge. Mr. Lee and Ms. Murphy have also been designated as experts.

12. Lynne Liberato  
Haynes & Boone LLP  
1221 McKinney Street, Suite 2100  
Houston, Texas 77010  
lynne.liberato@haynesboone.com  
Telephone: 713-547-2000

Ms. Liberato is a lawyer with knowledge of the legal and ethical disclosure requirements applicable to the underlying aggregate settlement; the advice that she provided to Clark, Love & Hutson, G.P. (“CLH”) concerning those requirements; and the procedures used and disclosures made by CLH in connection with the settlement, including that those procedures and disclosures met and exceeded all applicable legal and ethical requirements.

13. Edward F. Blizzard  
Blizzard Law, PLLC  
5020 Montrose Blvd  
Houston, TX 77006  
(713) 581-3032

Mr. Blizzard is an attorney who is licensed to practice law in the State of Texas. He is a retained expert. The subjects on which Mr. Blizzard will testify include the standard of care for attorneys practicing in the field of mass tort and TVM cases, actions that reasonable attorneys acting under the same or similar circumstances as CLH could have undertaken, aggregate settlements and standards related to attorneys involved in the same, and in rebuttal to any opinions that any designated expert listed by Plaintiffs may be permitted to offer which overlap in a field of his expertise. His qualifications, list of cases, and more specific opinions are contained in his report, which is unincorporated by reference and will be sent to all counsel by separate correspondence. Also, his qualifications may be found here at this website and URL: <https://www.blizzardlaw.com/attorneys/ed-blizzard/>.

14. Professor Lynn Baker  
2210 Greenlee Drive  
Austin, Texas 78703  
(512) 826-6810

Professor Baker is a lawyer and the Fred M. Baron Chair in Law at the University of Texas School of Law. She is a retained expert. She is also Co-Director of the Center on Lawyers—Civil Justice and the Media. Pursuant to the parties’ November 13, 2020 agreement, the CLH Defendants will provide Professor Baker’s report and the information required to be in it by January 11, 2021. Professor Baker will testify regarding aggregate settlements, including aggregate settlements in mass tort litigation; the propriety of the underlying aggregate settlements and settlement processes, including the CLH Defendants’ disclosures; and the propriety of CLH’s fee contracts with the Plaintiffs, including specifically in the context of the underlying mass tort litigation. Professor Baker will also testify in rebuttal to certain ethics opinions of Mark Ticer. A biographical profile of Professor Baker and a list of publications for Professor Baker, which the CLH Defendants may supplement on or before January 11, 2021, is attached.

15. Jim McCormack  
3267 Bee Cave Road  
Suite 107, PMB 107  
Austin, TX 78746-6773  
(512) 615-2408  
Mr. McCormack is an expert in legal ethics, legal malpractice, and the law governing attorneys generally in Texas. He is a retained expert. Based on the facts summarized in his report, his education, training and experience (and applying relevant legal authorities as noted herein), Mr. McCormack will testify to the professional duties attorneys owe clients through their representation, to his analysis and opinion of the October 29, 2020 Mark Ticer Report, and his opinion that the Lee Murphy Defendants did not breach a fiduciary duty or a duty of care.
16. Scott Freeman  
c/o Geoff Harrison  
Susman Godfrey, LLP  
1000 Louisiana St. # 5100  
Houston, TX 77002  
(713) 651-9366  
Mr. Freeman is familiar with Settlement Alliance and Archer Systems as a principal with those entities. Mr. Freeman has given an affidavit. He will be able to testify regarding the contents of his affidavit and that the allegation that any of the defendants have an ownership interest in Archer Systems is not true.
17. Jeff Vaughan  
Vaughan Law Firm, PC  
2909 Hillcroft St., Suite 575  
Houston, TX 77057  
(713) 255-5777  
Has knowledge regarding the efforts to solicit clients and former clients of Defendants to sue them for legal malpractice when they were previously satisfied with their settlement recoveries.
18. Matt Daher  
2909 Hillcroft St., Suite 575  
Houston, TX 77057  
(713) 255-5777  
Has knowledge regarding the efforts to solicit clients and former clients of Defendants to sue them for legal malpractice when they were previously satisfied with their settlement recoveries.

19. James Beggs  
140 East Irving Boulevard  
Irving, Texas 75060  
(972) 253-8000  
Outgoing counsel pending Substitution of Counsel. Has knowledge regarding the solicitation efforts made as to Plaintiffs to bring this legal malpractice lawsuit and the proceedings in state district court enjoining the unlawful behavior.
20. Lynda Landers  
1207 West University, Suite 102  
McKinney, TX 75069  
(972) 529-5707  
Outgoing counsel pending Substitution of Counsel. Has knowledge regarding the solicitation efforts made as to Plaintiffs to bring this legal malpractice lawsuit and the proceedings in state district court enjoining the unlawful behavior.